

1 Lyliane S. Couture
2 Larson Fowles, PLLC
3 821 E. Broadway Ave, Ste 8
Moses Lake, WA 98837
3 (509) 765-6700

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7 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA,)
9 Plaintiff,) Case No.: 2:19-CR-00111-WFN-1
10 vs.)
11 LUIS MANUEL FARIAS-CARDENAS,)
et al.,) NOTICE OF APPEARANCE AND
12 Defendant.) VERIFIED CLAIM
13) JURY DEMAND
13)
13) CLERK'S ACTION REQUIRED
13)

14 TO: Clerk of the Court; and

15 TO: Caitlin A. Baunsgard, Assistant United States Attorney and Counsel for
16 Plaintiff; and

17 TO: Brian M. Donovan, Assistant United States Attorney and Counsel for
18 Plaintiff.

19 PLEASE TAKE NOTICE that Lyliane S. Couture hereby appears as counsel

20 of record for Claimant Maria de J. Farias. All future pleadings and correspondence,

1 exclusive of original process, should be delivered to Ms. Couture at the following
2 address:

3 Larson Fowles, PLLC
4 821 E. Broadway Ave, Ste 8
Moses Lake, Washington 98837

5 FURTHER, PLEASE TAKE NOTICE that Claimant Maria de J. Farias
6 ("Claimant"), through her attorney, hereby claims an ownership interest in the
7 defendant property in this matter, such claim being superior to that of the United
8 States of America and equal to or superior to that of Luis Farias.

9 Claimant hereby specifically claims an ownership interest in the following real
10 property:

11 1. The real property being forfeited is commonly known as Parcel #
12 121145000, Moses Lake, Washington, described as follows:

13 All that lot or parcel of land, together with its buildings, appurtenances,
14 improvements, fixtures, attachments and easements, known as Parcel
#121145000, Moses Lake, Washington, legally described as follows:

15 Lots 1 to 3 Block 2 Wheeler. Tax Parcel No. 121145000

16 See Exhibit 1

17 2. The real property being forfeited is commonly known as Parcel #
18 121146000, Moses Lake, Washington, described as follows:

19 All that lot or parcel of land, together with its buildings, appurtenances,
20 improvements, fixtures, attachments and easements, known as Parcel
#121146000, Moses Lake, Washington, legally described as follows:

21 Lots 4 Block 2 Wheeler . Tax Parcel No. 121146000

1 See Exhibit 2

2 3. The real property being forfeited is commonly known as 14929 NE 4th
3 Street, Moses Lake, Washington, described as follows:

4 All that lot or parcel of land, together with its buildings, appurtenances,
5 improvements, fixtures, attachments and easements, known as Parcel 14929
5 NE 4th Street, Moses Lake, Washington, legally described as follows:

6 Lots 5 & 6 Block 2 Wheeler

7 Tax Parcel No. 121147000 and 600437000

8 See Exhibit 3, Exhibit 4, and Exhibit 5

9 Claimant hereby demands restitution of said property in its entirety and
10 demands the right to defend this action.

11 This claim is made on behalf of the Claimant by her attorney, the undersigned,
12 who is duly authorized to make said claim.

13 DATED this 20 day of October, 2020.

14 LARSON FOWLES, PLLC

15 s/Lyliane S. Couture
16 Lyliane S. Couture WSBA No. 32308
17 Attorney for Claimant Maria de J. Farias
18 Larson Fowles, PLLC
19 821 E. Broadway Ave., Ste 8
20 Moses Lake, WA. 98837
21 Phone: (509) 765-6700
Fax: (509) 765-6710
Lyliane.c@gmail.com

VERIFICATION

STATE OF WASHINGTON)
) ss.
COUNTY OF GRANT)

I declare under penalty of perjury that the foregoing is true or correct.

DATED this 20th day of October, 2020.

Maria de J Farias

Maria de J. Farias

1 EXHIBIT 1

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 Page 1 of 1 R 32.00 Grant Co., WA
 LUIS FARIAS



WHEN RECORDED RETURN TO:

Name: Luis M. Farias
 Address: 19229 5th St. NE
 City, State, Zip: Moses Lake WA 98837

REAL ESTATE EXCISE TAX		
G	AMT.	15.00
R	AMT.	
A	PEN	
P		
A		
C		
OUNTY		
D		
AFF		
BY		
JUN 11 2007		
192552		
DARRYL PHEASANT, TREASURER		

QUIT CLAIM DEED

THE GRANTOR

Emil Fatty, Jr.
 for and in consideration of Lots 1,2,3 Block #2 wheeler plat

conveys and quit claims to Luis M. Farias

the following described real estate, situated in the County of GRANT, State of Washington, together with all after acquired title of the grantor(s) herein

Lots 1,2,3, Block #2 wheeler plat

Tax Account Number: 12-1145-000

DATED 6/11/07

By Emil Fatty, Jr.
 By Luis M. Farias

STATE OF WASHINGTON)

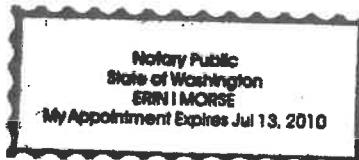
ss.

COUNTY OF Grant)

On this day personally appeared before me
Emil Fatty, Jr. and Luis M. Farias
 to me known to be the individual described in and who
 executed the within foregoing instrument, and
 acknowledged that they signed the same
 as their free and voluntary act
 and deed, for the uses and purposes therein mentioned.

GIVEN under my hand and official seal this
 day of June 2007.

Notary Public in and for the State of Washington,
 residing at Armenia, WA



1 EXHIBIT 2

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NOTICE OF APPEARANCE AND
VERIFIED CLAIM - 6

1281353 09/29/2009 04:34 PM TRTD
Page 1 of 2 R 63.00 Grant Co, WA
GRANT COUNTY TREASURER



NO REAL ESTATE EXCISE TAX PAID

AFFIDAVIT No. 202775

Date 9-29-09 By D. Pheasant
DARRYL PHEASANT, Treasurer
Grant County Washington

Return To: Grant County Treasurer
PO Box 37
Ephrata, WA 98823

No. 2676
TREASURER'S TAX DEED

STATE OF WASHINGTON]
COUNTY OF GRANT] ss

THIS INDENTURE, MADE this 18th day of September, 2009, Darryl Pheasant, as Treasurer, State of Washington, party of the first part, and Luis M Farias, as party of the second part.

WITNESSETH, that whereas, at a public sale of real estate held on this 18th day of September, 2009 in the Commissioners Hearing Room, second floor of the Grant County Courthouse in Ephrata in said County, pursuant to a real estate tax judgment entered in the Superior Court of the County of Grant on this 4th day of September, 2009 in proceedings to foreclose tax liens upon real property and an order of sale duly issued by said court. Luis M Farias duly purchased, in compliance with the laws of the State of Washington for and in consideration of the sum of Seven Hundred Thirty Five And 97/100 dollars, lawful money of the United States of America, to me in hand paid, the receipt whereof is hereby acknowledged, the following described real estate situated in Grant County, Washington to wit:

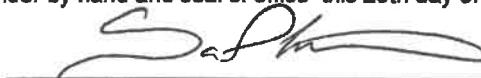
\$735.97 Parcel Number: 12-1146-000
Lot 4, Block 2, Wheeler. 50'x125'
\$735.97 Total

and that said Luis M Farias complied with the laws of the State of Washington necessary to entitle him to a deed for said real estate.

Together with all and singular, the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, and whereas, Luis M Farias, by his legal representatives, has complied with the laws of the State of Washington, necessary to entitle him to a Deed to said real estate.

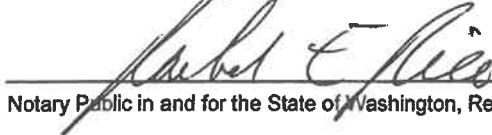
NOW THEREFORE, know ye, that I, Darryl Pheasant, Treasurer, of said County of Grant, State of Washington, in consideration of the promises and by virtue of the statutes of the State of Washington, in such cases provided hereby grant and convey unto Luis M Farias assigns forever, the said real estate herein before described in this instrument.

Given under by hand and seal of office this 29th day of September, 2009.

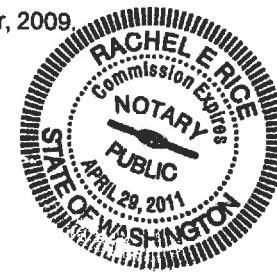


Treasurer of Grant County, Ephrata Washington

SUBSCRIBED AND SWORN TO BEFORE ME THIS this 29th day of September, 2009.



Notary Public in and for the State of Washington, Residing in Ephrata, Washington



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Page 2 of 2 R 63.00 Grant Co., WA
GRANT COUNTY TREASURER



1 EXHIBIT 3
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NOTICE OF APPEARANCE AND
VERIFIED CLAIM - 7



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Page: 1 of 3
03/26/2004 09:44A

Record at the Request of:
Luis and Maria Farias
PO Box 2177
Moses Lake WA 98837-0577

REAL ESTATE EXCISE TAX	
G	AMT.
R	<u>191.25</u>
A	W
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U	WASHING
Y	TON
DARRYL PHEASANT, TREASURER	

WARRANTY FULFILLMENT DEED

THE GRANTORS, IRVING SHIPMAN and MARGAET H. SHIPMAN, husband and wife, for and in consideration of TEN DOLLARS (\$10.00) and other valuable consideration, in hand paid, convey and warrant to LUIS M. FARIAS and MARIA de J. FARIAS, husband and wife, GRANTEEES the following described real estate, situated in the County of Grant, State of Washington:

Lots 5 and 6, Block 2, Wheeler, according to the plat thereof recorded in Volume 1 of Plats, page 56, records of Grant County, Washington.

Grant County Treasurer Parcel Nos.: 12-1147-000

Physical Address: undeveloped

SUBJECT TO:

General taxes for the year 2001, in the amount of 39.94, which are due and payable but not delinquent until after April 30, 2001. (Tax Parcel No. 12-1147-000)

WARRANTY FULFILLMENT DEED 1

Exceptions and reservations contained in Deed from the State of Washington, whereby the grantor excepts and reserves all oils, gases, coal, ores, minerals, fossils, etc., provided that no rights shall be exercised until provision has been made for full payment of all damages sustained by reason of such entry; recorded under Auditor's File No. 3425.

SUBJECT FURTHER TO EASMENTS, RESTRICTIONS AND RESERVATIONS OF RECORD.

This deed is given in fulfillment of that certain Real Estate Contract between the parties hereto, dated February 12, 2001, and conditioned for the conveyance of the above described property, and the covenants of warranty herein contained shall not apply to any title, interest or encumbrance arising by, through or under the purchaser in said contract, and shall not apply to any taxes, assessments or other charges levied, assessed or becoming due subsequent to the date of said contract.

DATED this 12 day of Feb., 2001.

Irving Shipman
IRVING SHIPMAN

Margaret H. Shipman
MARGARET H. SHIPMAN

STATE OF WASHINGTON)
: ss.
County of Grant)

On this day personally appeared before me **IRVING SHIPMAN** and **MARGARET H. SHIPMAN**, to me known to be the individuals described in and who executed the within and foregoing instrument, and acknowledged that they signed the same as their **WARRANTY FULFILLMENT DEED** 2



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Page: 2 of 3
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free and voluntary act and deed, for the uses and purposes
therein mentioned.

GIVEN under my hand and official seal this 12 day of
February, 2001.

Sophy Anderson

Notary Public in and for the State
of Washington, residing at
Moses Lake. My Commission
Expires: 7/8/01



WARRANTY FULFILLMENT DEED 3



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Page: 3 of 3

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ADEPT ESCROW SVCS IN WFD

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EXHIBIT 4

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NOTICE OF APPEARANCE AND
VERIFIED CLAIM - 8



Validated Copy of Record

Print date: 10/08/2020

Model Year 1977	Make STAL	Model 28/66	Body Style	Vehicle identification number (VIN) 7015	Scale Weight 0
Plate/Tag no N/A	Tab/Decal no N/A	Primary vehicle use type Mobile Home	Issue date	Exp date	
Plate/Tag no	Tab/Decal No	Vehicle use type	Issue date	Exp date	
Gross Weight	Gr wt start date	Gross weight exp date	Fleet no	Equip no	
Purchase Date 08-Oct-2020	Purchase Price 0.00				

Registered Owner

FARIAS, MARIA
14929 4TH ST NE
MOSES LAKE WA 98837-9511

Legal Owner

Same as Registered Owner

Brands/Comments: 24090/2001

Anyone who knowingly makes a false statement may be guilty of a felony under state law and upon conviction shall be punished by a fine, imprisonment, or both.

L0115223062

TD-420-802 (R/12/16) Page 1 of 2

Vehicle Information: 7015 1977 STAL 28/66

Filing	Title Filing	\$5.50
Service	Title Service Fee	\$15.00
Title	Manuf Home Title Transfer	\$15.00
	Vehicle Title Application	\$15.00

Fee Total: \$50.50

You can get a copy of this cash/fee receipt detail at www.dol.wa.gov.Skip a trip – go online www.dol.wa.gov

EXHIBIT 5

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NOTICE OF APPEARANCE AND
VERIFIED CLAIM - 9

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PARTIES

HOUR 0.00 Grant Co Aud

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Page: 2 of 2
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031 PAGE 223

No. 19636

CERTIFICATE OF MARRIAGE

State of Washington County of GRANT

This is to Certify that the undersigned a Catholic Priest by authority of a license bearing date the 26th day of JUNE A.D. 1998, and issued by the County Auditor of the County of GRANT, did on the 18th day of JULY A.D. 1998, at ROYAL CITY in the County of GRANT, State aforesaid, join in lawful wedlock LUIS MANUEL FARIAS of the County of GRANT, State of WASHINGTON and MARIA DEJESUS CERVA ORTEGA of the County of GRANT, State of WASHINGTON with their mutual assent in the presence of Nazario Serna and Maribel Serna.

In Testimony Whereof, witness the signatures of the parties to said ceremony, the witnesses, and myself, this 11th day of JULY 1998.

<u>Luis M. Farias</u> SIGNATURE OF CONTRACTING PARTIES	<u>11-27-78</u> DATE OF BIRTH	Thereby certify that this Certificate of Marriage was filed on <u>JULY 14, 1998</u> in Book <u>081</u> on Page <u>223</u> of the Register of Deeds.
<u>Nazario Serna</u> WITNESS	<u>1-13-73</u> DATE OF BIRTH	Dated the <u>13</u> day of <u>MAY</u> <u>2011</u>
<u>Maribel Serna</u> WITNESS	<u>1-20-78</u> DATE OF BIRTH	

William V. Vargas
Patricia Fariñas

STATE OF WASHINGTON
COUNTY OF GRANT)vs.
I, DAVID W. FIREBAUGH, COUNTY AUDITOR OF GRANT COUNTY OF THE STATE OF WASHINGTON, DO HEREBY CERTIFY THAT THE FOREGOING INSTRUMENT IS A TRUE AND CORRECT COPY OF THE ORIGINAL NOW OF RECORD IN THIS OFFICE IN MY TESTIMONY HEREOF I HAVE HEREUNTO SET MY HAND AND AFFIXED MY OFFICIAL SEAL THIS 11 DAY OF MAY 2011

David W. Firebaugh
BY DEPUTY AUDITOR

NOTE: This Certificate must be returned to the County Auditor of the County in which the license was issued within thirty days from date ceremony was performed.

